



LAW FIRM OF
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ADMITTED: NEW YORK, EIGHTH CIRCUIT
SECOND CIRCUIT, ALGERIAN BAR
US COURT ON INTERNATIONAL TRADE

January 10, 2018

VIA ECF

The Honorable Sarah Netburn
United States Magistrate Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: In re Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

On behalf of the World Assembly of Muslim Youth (“WAMY”) we write to respectfully clarify statements made in Plaintiffs’ correspondence dated January 5, 2018 on the status of WAMY’s merit discovery (DKT # 3856).

By way of information, WAMY and WAMY International have produced 1,232,841 pages of documents. This production was the result of WAMY’s extreme diligence, at great expense, searching for documents responsive to Plaintiffs’ requests. Following Your Honor’s October 12, 2017 discovery Order, WAMY produced 118,097 pages to Plaintiffs, by the November 30, 2017 deadline. In mid-November 2017, our client informed us that they had discovered additional documents. On November 30, 2017, along with our production reflecting this Court’s deadline for WAMY’s discovery, we informed Plaintiffs about the recently discovered documents. Our team worked diligently and speedily reviewed the newly discovered documents, and on December 18, 2017 we supplemented WAMY’s November 30th production with a production of 59,382 pages.

Plaintiffs have indicated that they intend to file a motion to compel against WAMY because a great number of WAMY’s documents do not appear relevant to Plaintiffs’ requests. WAMY rejects this premise. The documents produced are responsive to Plaintiffs’ often very broad discovery requests. WAMY is hoping Plaintiffs will engage in a good faith effort to resolve any outstanding discovery issues before making any motions. WAMY will not delve into specifics in this letter. Nevertheless, it will be open to discuss any issues with Plaintiffs to resolve any outstanding WAMY discovery issues.

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WAMY would like to inform the Court, that it has some outstanding discovery issues with Plaintiffs. WAMY shall be reaching out to Plaintiffs' in the hope to resolve the outstanding Plaintiffs' discovery issues.

Respectfully Submitted,

/s/ Omar Mohammedi

Omar Mohammedi, Esq.

/s/Fredrick Goetz

Frederick Goetz, Esq.

cc: All MDL Counsel of Record (via ECF)